

TO:
Robin L. Blume, Clerk of Court,
United States District Court for the District of South Carolina,
Charleston Federal Courthouse,
85 Broad Street, Charleston,
South Carolina 29401

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2021 MAR 16 AM 9:27

Cc:
Paul J. Napoli, Esq.
Hunter Shkolnik, Esq.
Napoli Shkolnik PLLC
270 Munoz Rivera Ave, Ste 201
Hato Rey, PR 00918

Robert A. Bilott, Esq.
Taft Stettinius & Hollister LLP
425 Walnut Street, Suite 1800
Cincinnati, OH 45202-3957

Counsel for Tyco Fire Products LP and Chemguard, Inc.:
Joseph G. Petrosinelli, Esq.
Liam J. Montgomery, Esq.
Williams & Connolly, LLP
725 12th Street, N.W.
Washington, DC 20005

Counsel for ChemDesign Products, Inc.:
J. Hayes Ryan, Esq.
Jonathan B. Blakley, Esq.
Gordon Rees Scully Mansukhani, LLP
1 N. Franklin Street, Ste. 800
Chicago, IL 60606

Date: 3/5/2021

Re: Objection to the Campbell v. Tyco Fire Products LP Class Action Settlement

Case Number: 2:19-cv-00422-RMG

I wish to file an objection to the above named settlement.

I understand, per the Settlement, my responses to the following are required in order to file an objection:

Are you a current or former employee, agent or contractor of any Defendant or Class Counsel?

YES

NO

The objection must bear the Personal Signature of the Class Member, and state (i) the Class Member's name, address, and telephone number;

Class Members Name (please print):

Cheryl Lamant

Class Members Address:

N 2981 Cooke Lane
Marinette

Class Members State:

WI

Class Members Telephone Number:

414-218-9266

Personal Signature of Class Member:

Cheryl Lamant

List the reasons for the Class Member's objection (include the complete factual basis for the objection, along with whatever legal authority, if any, the objector asserts regarding the objection):

List objection(s):

a. I'd like to bring to your attention the difficulty it will be for any former resident wishing to file a claim for damages under the exposure category. As per the Settlement document, proof of claim requires that a person demonstrate;

- 1) They currently reside or formerly reside in or currently own or formally owned a residential property in the class area for at least a year during the class period (between 1965 and 2020).
- 2) They drank, cooked with, bathed in, or otherwise were exposed to water supplied from a private well drinking water source.

The "Proof of Claim Form and Release" indicates on page 5. VI. RESIDENT ELIGIBILITY, Proof Requirements. "Class Members must demonstrate proof of residency in the Class Area at any time between January 1, 1965 and December 31, 2020 from at least one of the following sources: State-issued identification with address (such as Driver's License), Utility Bill, Other types of bills or bank statements or mail addressed to name and address above.

The problem with requiring these as verifications is that they are nearly impossible to provide. For example - our scenario is this... My wife and I both grew up in homes in the Class Area. Living there from birth through high school. The only State-issued ID in those days that a person age 0-18 would have is a Driver's License. We therefore contact the DMV for documentation of our Licenses. They don't have any records (available to the public) earlier than 1991. Next, a 0-18 year old would not have a utility bill or other bill or bank statement in their name. So, the ONLY document a person could possibly provide is a letter mailed to them at their former address (45-50 years ago)! Not probable.

We ask the Claims Administrator to accept other documents to validate former addresses. Perhaps Primary School Transcripts, High School Transcripts, University Transcripts, Religious Records, Sworn Affidavits.

As I mentioned - the Claim form specifically states; FAILURE TO SUBMIT THE REQUIRED DOCUMENTS MAY RESULT IN DELAY OR REJECTION OF YOUR CLAIM.

Without clarification on this point of acceptable documentation, it will be nearly impossible for people to meet the proof standards for former resident.

List the factual basis for the claim of class membership:

I meet the following requirements:

- During the period between January 1, 1965 and December 31, 2020
- I resided in or owned, a property with a Private Well Drinking-Water Source
- within the area bounded in the north by University Drive, in the south by Heath Lane, in the west by Roosevelt Road, in the east by the Bay of Green Bay, all in the Town of Peshtigo, Wisconsin,
- for at least one year.

Circle one:

YES

NO

Are you a current or former Owner of a property in the Class Area?

Circle one:

Current Owner

Former Owner

Period of time (in years) you owned during class period (1965 thru 2020)?

List Number of years: 2007 - current

Are you a current or former resident of a property in the Class Area?

Circle one:

Current Resident

Former Resident

Period of time (in years) you resided during class period (1965 thru 2020)?

List Number of years: 2007 - current

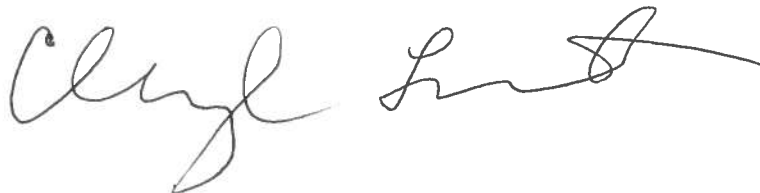
Birth to
Age 19

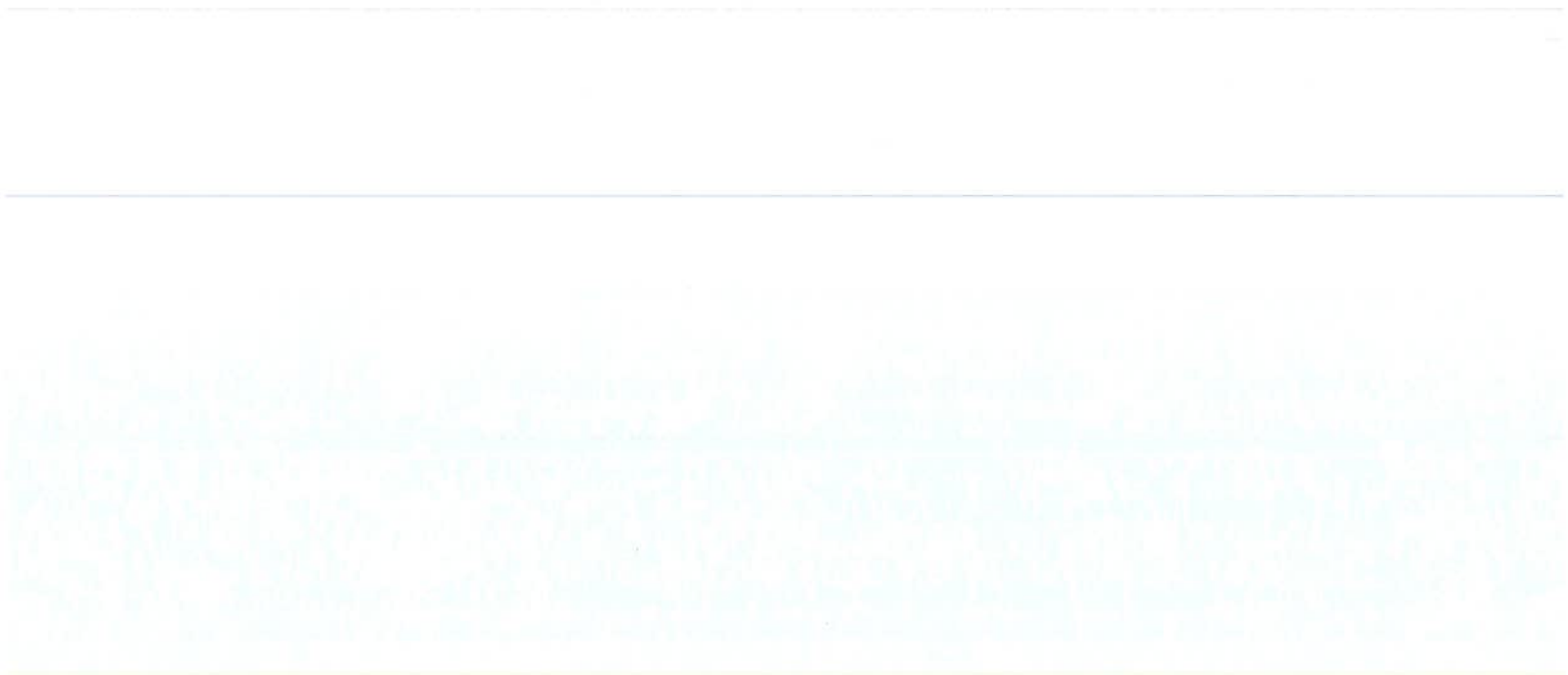
Do you plan to appear in person at the Fairness Hearing (scheduled for May 24, 2021) at the U.S. District Court for the District of South Carolina, 83 Meeting Street, Charleston, South Carolina 29401.

YES

NO

Sincerely,





J. Lamont
N 2981 Codriss Lane
Marionette, WI 54143

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